April 26, 2011

The Honorable Dow Constantine, Chair Growth Management Planning Council King County Department of Developmental & Environmental Services 900 Oakesdale Avenue SW Renton, WA 98057-5212

Dear Chair Constantine:

As mayors of South King County cities, we appreciate the opportunity to review and comment on the draft update of the King County Countywide Planning Policies (CPPs). The CPPs are an important and integral component of our work under the State Growth Management Act (GMA) as we advance towards required 2014 updates of our comprehensive plans. Additionally, we recognize and appreciate the work of the Growth Management Planning Council (GMPC) on these policies. It will ensure coordination and consistency among cities, towns, and King County as we plan together under the GMA.

We have identified an issue in the draft that gives us cause for concern: the proposed affordable housing targets. While the draft CPPs have been overhauled and updated, the affordable housing methodology has not changed. The methodology that establishes the distribution of affordable housing, developed in the early 90s, should be updated as well for a number of reasons, as discussed below.

Whether through annexation, incorporation, or simply the evolving nature of urbanization, the cities that agreed to the original affordable housing methodology in the 1990s are not the same cities being asked to approve this update to the CPPs today.

One of the most significant challenges we face as cities is the new household growth targets ratified as part of a recent CPP update. The new household growth allocation provides the basis for the affordable housing target for each jurisdiction. These new allocations are challenging for many cities, especially Core Cities and Large Cities in the regional geography that have accepted high household growth targets. Having an affordable housing methodology that is based on the new household growth allocations compounds the challenges.

Lastly, there needs to be consideration given to the affordable housing stock created by South King County cities and other municipalities since the original countywide planning policies were adopted almost 20 years ago. Cities have performed differently in carrying out the growth management goal of providing affordable housing for all economic segments of the population, and this needs to be recognized.

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We realize that market forces play a significant role in affordable housing, and that affordable housing targets are just that—targets. But, accepting an outdated methodology for establishing the distribution of affordable housing does not make sense. We request the GMPC direct staff to develop a new or revised methodology that reflects current conditions, with subsequent GMPC consideration. We and our staff stand ready to assist you in this effort in order to get this update to the CPPs done in a timely manner.

Sincerely,

Pete Lewis

Mayor, City of Auburn

Skip Priest

Mayor, City of Federal Way

Denis Law

Mayor, City of Renton

Mayor, City of Tukwila

Robert F. Sheckler

Mayor, City of Des Moines

Suzette Cooke

Mayor, City of Kent

Terry Anderson

Mayor, City of SeaTac